

CORRES. CONTROL
INCOMING LTR NO.

00014 RF05

DUE DATE

ACTION

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2005 JAN 12 P 4: 04

CORRESPONDENCE
CONTROL

STATE OF COLORADO

Colorado Department
of Public Health
and EnvironmentBill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Denver, Colorado 80246-1530
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TDD Line (303) 691-7700
Located in Glendale, Colorado
http://www.cdphe.state.co.usLaboratory Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

DIST.	LTR	ENC
BERARDINI, J.H.	X	X
BOGNAR, E.S.	X	X
BROOKS, L.	X	X
CARPENTER, M.	X	X
CIUCCI, J.A.		
CROCKETT, G. A.		
DECK, C. A.	X	X
DEGENHART, K. R.		
DEL VECCHIO, D.		
DIETER, T. J.		
FERRERA, D. W.	X	X
GIACOMINI, J. J.		
LINDSAY, D. C.		
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	X
NAGEL, R. E.	X	X
NESTA, S.		
NORTH, K.	X	X
SHELTON, D. C.	X	X
SPEARS, M. S.	X	X
TUOR, N. R.	X	X
WIEMELT, K.	X	X
WILLIAMS, J. L.		
ZAHM, C.	X	X

December 30, 2004

Mr. Joseph A. Legare

Director, Project Management Division

U.S. Department of Energy, Rocky Flats Project Office

10808 Highway 93, Unit A

Golden, CO 80403-8200

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (CDPHE) has reviewed the following documents concerning Building 528:

- o Notification of Facility Disposition RSOP implementation dated December 23, 2004; and
- o Pre-Demolition Survey Report, version 0, dated December 8, 2004 and sent under DOE cover letter dated December 20, 2004.

CDPHE hereby approves both documents, with the caveat that the six-point analysis in the RSOP notification be revised as reflected in the sheet attached to this letter. Demolition of the building is hereby allowed to proceed, with the understanding that the entire structure will be managed and disposed of as low level radioactive waste.

If you have any questions regarding this correspondence, please contact me at (303) 692-3367, or Denise Onyskiw at (303) 692-3371.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

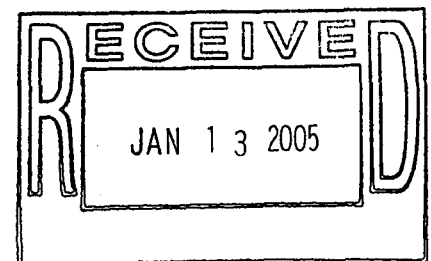
COR. CONTROL	X	X
ADMIN. RECORD	X	X
PATS/130		

Reviewed for Addressee
Corres. Control RFP1/12/05
Date By

Ref. Ltr. #

DOE ORDER #

5400.1

cc: Denise Onyskiw, CDPHE
Mark Aguilar, EPA
Sam Garcia, EPA
Dave Shelton, Kaiser-Hill
Administrative Record, T130G

ADMIN RECORD

B559-A-000036

This information was requested due to unique circumstances with the condition of Building 528 (B528) that have made decontamination of the facility prior to demolition undesirable. B528 contains a pit in excess of 20 feet deep that has fixed radioactive contamination throughout the structure. Decontamination of the pit would require unnecessary safety risks, and significant expense. Kaiser Hill prefers to demolish the entire structure, without decontamination, and manage the debris as low-level waste (LLW). This approach will alleviate the safety risks associated with working in the pit, and reduce the overall cost of demolition with no additional risks of environmental contamination or worker exposure.

The following planning requirements for removing contaminated portions of the B528 have been prepared in accordance with the six points specified in section 3.8.1 of the RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities.

1. **Relative Costs:** The radiological contamination on the interior surfaces of B528 is fixed contamination throughout the concrete structure. Post-fixative concentrations remain up to 600dpm, and disposing of the entire building as LLW has significant safety and economic advantage relative to attempting to decontaminate the concrete. See the Pre-Demolition Survey Report (PDSR) for a detailed account of contamination levels and locations.
2. **Structural Evaluation:** - The entire structure is being removed, including all below ground components. The utility tunnel running from the pit to B561 is outside the scope of this project and will be addressed during a separate effort. Analysis by a Professional Engineer is not necessary.
3. **Air Emissions:** The site Air Quality SME has evaluated the plan for demolishing the building and has no concerns with radionuclides, beryllium, or other hazardous pollutants. An Enhanced Air Monitoring Plan is not necessary. [REDACTED]
4. **Dust Generation:** The site Air Quality SME has evaluated the plan for demolition and has no concerns with dust generation. [REDACTED]
5. **Impacts to Surface Water:** The demolition of B528 has minimal potential to impact surface water systems. Breaking and removing the concrete structure is not expected to require an extensive amount of water to control dust. Ditches or drainages in the vicinity of B528 will be protected with silt fences, hay bales, wattles, etc.
6. **Impacts to Migratory Birds:** Building 528 is being demolished during the winter, and no issues with migratory birds are anticipated.